

1 **HENNESSY LAW GROUP**

2 Timothy P. Hennessy, State Bar No. 286317
3 1215 "L" Street
4 Bakersfield, CA 93301
5 Tel: (661) 237-7179
6 Email : tph@hennessyatlaw. com

7 Attorney for:

8 **JASWINDER BHANGOO**

9 **UNITED STATES DISTRICT COURT**

10 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

11 **UNITED STATES OF AMERICA,**

12 Plaintiff,

13 v.

14 **JASWINDER BHANGOO,**

15 Defendants.

Case No. 1:23-cr-00171-NODJ-BAM

**STIPULATION AND ORDER TO
CONTINUE THE SENTENCING HEARING**

16 TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, BEFORE A DISTRICT
17 JUDGE AND BRITTANY GUNTER, ASSISTANT UNITED STATES ATTORNEY:

18 **COMES NOW** Defendant, JASWINDER BHANGOO, by and through his attorney of
19 record, Timothy Hennessy hereby requesting that the sentencing hearing currently set for
Tuesday, February 20, 2024, be continued to April 29, 2024.

20 Defense counsel is currently engaged in a federal trial *Charles Barrett 1:22-cr-00213-*
21 *JAM-BAM USA v. Barrett*. The continuance is necessary to allow defense counsel sufficient time
22 to review the PSR with the defendant, prepare and file objections, and prepare for sentencing after
23 receipt of the final PSR. I have spoken to AUSA Brittany Gunter, and she has no objection to
24 continuing the matter. In addition, all counsel and USPO Ross Micheli have agreed to continue
25 the dates set forth in the Presentence Investigation Referral/Schedule to the following dates:

26 **Formal Objections Filed with Court and Served to Probation and Opposing Counsel April 15, 2024**

27 **Reply, or Statement of Non-Opposition April 24, 2024**

28 **Judgement and Sentencing Date April 29, 2024**

1
2
3 **IT IS SO STIPULATED.**
4
5

6 Respectfully Submitted,
7
8

9 DATED: February 7, 2024
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2 */s/ Timothy Hennessy*
3 TIMOTHY HENNESSY
4 Attorney for Defendant
5 Jaswinder Bhangoo
6
7
8

9 DATED: February 7, 2024
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2 */s/ Brittany Gunter*
3 BRITTANY GUNTER
4 Assistant U.S. Attorney
5
6
7
8

1 **ORDER**

2 IT IS SO ORDER that the sentencing hearing currently set for Tuesday, February 20,
3 2024, be continued to **April 29, 2024, at 8:30 am in Courtroom 5 before the District Court**
4 **Judge**, and the following briefing schedule be adopted:

5 **Formal Objections Filed with Court and Served to Probation and Opposing Counsel**
6 **April 15, 2024. Reply, or Statement of Non-Opposition April 24, 2024. Judgement and**
7 **Sentencing Date April 29, 2024.**

8 IT IS SO ORDERED.

9
10 Dated: February 8, 2024

/s/ Barbara A. McAuliffe
11 UNITED STATES MAGISTRATE JUDGE

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28